

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
SECOND SET OF INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS JOSEPH D. MOELLER  
(NAA/USPS-T28-16-18)  
November 16, 2001**

The Newspaper Association of America hereby submits the attached  
interrogatories to United States Postal Service witness Joseph D. Moeller (USPS-T-28)  
and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all  
participants requesting such service in this proceeding in accordance with section 12 of  
the Rules of Practice.

November 16, 2001

William B. Baker  
William B. Baker

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SECOND SET OF INTERROGATORIES TO  
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(NAA/USPS-T28-16-18)

NAA/USPS-T28-16: Please refer to your responses to AAPS/USPS-T28-3(a) and NAA/USPS-T28-13.

- a. Please confirm that your accurate quotation from the Docket No. R2000-1 proceeding is, in fact, from page 3 of the rebuttal testimony of Newspaper Association of America witness William Wilson.
- b. Please confirm that in Docket No. R2000-1, the testimony of witness White was sponsored by AAPS, not by NAA.
- c. Does the fact that you have twice quoted this passage indicate that you agree with it? Please explain any response other than an unqualified affirmative.

NAA/USPS-T28-17: Imagine that a large national saturation mailer of shared mail products owns an alternate delivery system that delivers its products in some markets, and the Postal Service in others. Would such a large national saturation mailers both a customer and a competitor of ECR mail?

NAA/USPS-T28-18: Please refer to your response to POIR No. 2, Question 6, and witness Hope's WP1, page Q. Please reconcile your figure for Commercial ECR postage of \$5,541,973 (in '000s) with witness Hope's ECR revenue from rates (line 28) of \$5,538,863 (in '000s).